REMARKS

Claims 1-2, 5-12, 15-21, 23-30, 33-40, and 42-47 are pending in the present case. Claims 1, 11, 21, 29 and 38 are amended herein. Applicant respectfully requests further consideration in view of the above amendments to the present application, and the arguments set forth below. No new matter is added herein.

CLAIM REJECTIONS

Claims 1-2, 5-12, 15-21, 23-30, 33-40, and 42-47 are rejected under 35 USC 103(a) over US Patent No. 6,405,037 to Rossmann (hereinafter Rossmann) in view of US Patent Application Publication No. 2002/00113994 by Smith, II, et al. (hereinafter Smith). Applicants have reviewed the references cited and respectfully assert that they do not teach or suggest the embodiments of the present invention as recited in Claims 1-2, 5-12, 15-21, 23-30, 33-40, and 42-47 for the following rationale.

As Applicants understand the reference, Rossmann teaches a method and architecture for an interactive two-way data communication network, within which information is provided by a server to a facsimile gateway. Rossmann, col. 15, ll. 40-45. Rossmann goes on to teach that, in response to the access by a user, the server "transmits a card deck to [the] cellular telephone," wherein the "card deck includes one or more cards, and each card is interpreted by the client module to generate a user interface screen." Id. at col. 12, ll. 16-23.

As Applicants understand the reference, Smith teaches a "method and apparatus for printing information selected from a mobile device" (Smith at ¶ 0007) wherein a "truncated portion of the information is received and displayed at the

mobile device" (Id.), wherein the truncated information is stored in the mobile device" (Id.), and wherein, until a "coupling [of the mobile device] to a high capacity presentation apparatus is detected and the stored information is conveyed to the high capacity presentation apparatus in response to the detection, whereby the high capacity presentation apparatus obtains and prints the information." (Id.) Applicants note Smith's express use of the word "whereby," with which Applicant's understand the reference to expressly limit the manner with which its "high capacity presentation apparatus [so] obtains and prints the information." (Id.)

As the Smith reference goes on to expressly explain, "[f]rom the truncated information set, a full length information set can be requested to be delivered at a later time to a communications apparatus having a high capacity presentation capability, such as a computer system with capabilities for a printer, a video display, an e-mail message file, a web page, or a similar high capacity presentation apparatus. Likewise, a full length information set can be directly delivered at a later time to such a high capacity system." (Id. at ¶ 0019) In this, the preceding and the next paragraph, underlining is added to the quotations from Smith for emphasis.

Through the reference's use of the underlined terms and phrases above, including: "stored," "until," and (twice) "at a later time," Applicants understand Smith to expressly teach that there is some anticipated delay between the display of the truncated information at Smith's mobile device and (1) the detection of its coupling to Smith's high capacity presentation apparatus, "whereby the high capacity presentation apparatus obtains and prints the information" (Id. at ¶ 0007),

(2) requested delivery of the full length information set to the communications apparatus having a high capacity presentation capability, and (3) direct delivery to a high capacity presentation system.

Applicants also note that Smith expressly teaches that these anticipated delays eventually lead to the delivery of the information: (4) upon the mobile device detecting its coupling to the high capacity presentation apparatus or (5) its direct delivery thereto. Smith explains that the direct information delivery by mobile devices (exemplified by a PDA) is provided for "when the PDA is proximate to (for example, in electrical contact or within short-range electromagnetic propagation distance such as may be expected from infrared or Bluetooth-type links." Id. at ¶ 0021. Further, while Applicants note that while Smith expressly exemplifies the communications apparatus having high capacity presentation capability "as a computer system with capabilities for a printer, a video display, etc.," (Id. at ¶ 0019), Applicants find no teaching or suggestion in the reference directed to a facsimile (fax) system. In fact, Applicants respectfully assert that these represent the only reasonable interpretation of these express teachings of Smith.

The teachings of Rossmann and Smith each differ from the embodiments of the present invention recited in Claims 1-2, 5-12, 15-21, 23-30, 33-40, and 42-47. Claim 1, as amended herein, reads as follows, with underlining added for emphasis herein:

> 1. In a server system communicatively coupled to a mobile device, a method for retrieving and communicating information, said method comprising:
>
> accessing an instruction from said mobile device which identifies information by said server system, wherein said information corresponds to data displayed on said mobile device, wherein said information corresponds to said data displayed on said mobile device and comprises one or more of said data and a

body of further information related to said data, wherein the size of said body of further information is greater than is efficiently displayable on said mobile device;

retrieving said information;

formatting said information into a form compatible with facsimile transmission, wherein said formatting is performed by said server system; and

transmitting said information to any facsimile system communicatively accessible with said server system, wherein said facsimile system effectively functions as an accessible printer device for said mobile device, for printing a hard copy of said information effectively instantaneously.

Independent Claims 11, 21, 29, and 38 are amended herein in a similar way.

More specifically, Claims 1, 11, 21, 29, and 38 all recite that information, corresponding to data displayed at a mobile device, upon retrieval by a server, is formatted by the server into a form compatible with facsimile transmission and sent to any facsimile (fax) system communicatively accessible with the server. The information sent to the facsimile system is one or more of the data or a body (e.g., corpus, etc.) of information of a size too great for efficient (e.g., effective) display on the mobile device. These claims also recite that any such fax system thus functions as an accessible printer for the mobile device. Further, a hard copy of the information is thus printable with the fax effectively instantaneously.

This has the advantage of allowing a user of any mobile device, such as a cellular telephone, a portable digital assistant (PDA), etc. to selectively print information at any facsimile device, anywhere, that can be communicatively accessed with the server. It also allows the user the benefit of printing a relatively limited amount of information, such as the data displayed on the small mobile device display screen, or printing a larger corpus of information relating to this small mobile device data, such as larger web documents, including whole web pages, with graphics and other features. Further, it allows a hard copy of the information, either

the relatively limited data displayed at the PDA or the corresponding greater body of information, to be displayed effectively instantaneously. This has the great benefit of allowing a user to print a hard copy instantly, immediately, etc., upon demand, to any convenient fax.

Applicants find no teaching or suggestion within either Rossmann or Smith to send information corresponding to data displayed, either the limited display thereon or a larger corresponding corpus of information, to any facsimile system, or of allowing any facsimile system communicatively accessible with a server system to effectively function as a printer for any mobile device, and to print a hard copy of the information effectively instantaneously. Thus Applicants respectfully assert that Rossmann and Smith, individually or combined, do not teach or suggest the embodiments recited in Claims 1, 11, 21, 29, and 38 and their respective dependent claims.

Applicants further respectfully assert that Rossmann's teaching of a server, in response to access by a user, transmitting a card deck to a cellular telephone, wherein the "card deck includes one or more cards, and each card is interpreted by the client module to generate a user interface screen" (Id.) effectively teaches away from the embodiments recited in Claims 1, 11, 21, 29, and 38, and thus does not suggest these embodiments.

Moreover, Applicants respectfully assert that Smith expressly teaches away from embodiments recited in Claims 1, 11, 21, 29, and 38 on the following bases: (1) Smith's teachings directed toward either the detection of its coupling to Smith's high capacity presentation apparatus, "whereby the high capacity presentation apparatus obtains and prints the information" (Op. Cit. at ¶ 0007), toward direct

delivery to a high capacity presentation system via electrical contact therewith, infrared, Bluetooth, etc., or generally, to a requisite proximity between the mobile device and the high capacity presentation apparatus teach away from the embodiments recited herein, wherein the information is transmitted to a Fax system; (2) Smith's teachings directed toward to the communications apparatus exemplified by a computer system having a printer, display, etc. teach away from the Fax system recited herein effectively providing a convenient printer; and (3) Smith's express teachings relating to anticipated delay in first storing and then eventually leading to the delivery of the information teaches away from the embodiments recited herein, wherein a hard copy can be printed from any Fax effectively instantaneously.

Applicants respectfully assert that nothing in Rossmann cures the defects in Smith, discussed above. Applicants respectfully assert that nothing in Smith cures the defects of Rossmann, discussed above. Thus, Applicants respectfully assert that the references, taken individually or in combination, do not teach or suggest the embodiments recited herein. Thus, Applicants respectfully assert that the cited references, jointly or separately, do not teach or suggest the embodiments recited herein. Moreover, Applicants respectfully assert that both cited references teach away from the embodiments recited herein. Therefore, Applicants respectfully asset that Claims 1-2, 5-12, 15-21, 23-30, 33-40, and 42-47 are allowable over the cited references under 35 USC 103(a).

CONCLUSION

Applicants respectfully assert that, by the rationale stated above, Claims 1-2, 5-12, 15-21, 23-30, 33-40, and 42-47 are allowable under 35 USC 103(a). Accordingly, Applicants respectfully request that the rejection of Claims 1-2, 5-12, 15-21, 23-30, 33-40, and 42-47 under 35 USC 103(a) be withdrawn and that Claims 1-2, 5-12, 15-21, 23-30, 33-40, and 42-47 be allowed.

Please charge our deposit account No. 23-0085, for any unpaid fees.

Respectfully submitted,

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